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Attorneys for Defendant Avenue Capital Management II, L.P.

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

KEITH THOMAS, RICHARD HAYES, HERB  
SMITH, and OKLAHOMA POLICE PENSION &  
RETIREMENT SYSTEM,

## Plaintiffs.

V.

MAGNACHIP SEMICONDUCTOR CORP. SANG PARK, TAE YOUNG HWANG, MARGARET SAKAI, R. DOUGLAS NORBY, ILBOK LEE, NADER TAVAKOLI, RANDAL KLEIN, MICHAEL ELKINS, AVENUE CAPITAL MANAGEMENT II, L.P., BARCLAYS CAPITAL INC., DEUTSCHE BANK SECURITIES INC., CITIGROUP GLOBAL MARKETS INC., UBS SECURITIES LLC and NEEDHAM & COMPANY, LLC.

### Defendants.

CASE NO.: 3:14-cv-01160-JST

**STIPULATION REGARDING  
MOTION FOR CLASS  
CERTIFICATION**

**WHEREAS**, on July 8, 2016, Plaintiffs filed a Motion for Class Certification, ECF No. 231 (“Motion”);

**WHEREAS**, Avenue Capital Management II, L.P.'s ("Avenue") opposition ("Opposition") to the Motion is due on October 14, 2016;

**WHEREAS**, Plaintiffs' reply to the Opposition ("Reply") is due on December 2, 2016;

1                   **WHEREAS**, Avenue requests to increase its page limit for the Opposition from  
2 25 pages to 35 pages;

3                   **WHEREAS**, Plaintiffs request to increase their page limit for the Reply from 15  
4 pages to 25 pages;

5                   **IT IS HEREBY STIPULATED, SUBJECT TO COURT APPROVAL,**  
6 **THAT:**

- 7     1. Avenue's Opposition shall not exceed 35 pages, exclusive of cover sheet, tables of  
8       contents and authorities, and appendices; and
- 9     2. Plaintiffs' Reply shall not exceed 25 pages, exclusive of cover sheet, tables of contents  
10      and authorities, and appendices.

11                  Dated: October 7, 2016

12                  POMERANTZ LLP

13                  \_\_\_\_\_  
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34                  *Lead Counsel for the Class*

35                  AKIN GUMP STRAUSS HAUER & FELD  
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56                  *Attorneys for Defendant Avenue Capital  
57                  Management II, L.P.*

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3           **CERTIFICATION OF CONCURRENCE FROM OTHER PARTIES**

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I, John C. Murphy, am the ECF User whose ID and password are being used to file this  
STIPULATION REGARDING MOTION FOR CLASS CERTIFICATION. In compliance with  
Civil L.R. 5-1(i)(3), I hereby attest that the other signatory has concurred in this filing.

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/s/ John C. Murphy  
John C. Murphy

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**IT IS SO ORDERED.**

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Dated: October 11, 2016

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Honorable Jon S. Tigar  
United States District Judge